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**POLICY System\_HR95 MANDATORY COVID-19 VACCINE PROCEDURE - PHASED IMPLEMENTATION**

**Effective Date:** 04/01/2021

**Origination Date:** 04/01/2021

**Reference Number:** 24783

**Date Revised/Reviewed:** 04/01/2021

**Version:** 1

**Target Review Date:** 04/01/2024

**Originating Area:**  
Human Resources

**Applies To:**

Houston Methodist Hospital, The Medical Center  
Houston Methodist Baytown  
Houston Methodist Clear Lake  
Houston Methodist Continuing Care Hospital  
Houston Methodist Sugar Land  
Houston Methodist The Woodlands  
Houston Methodist West  
Houston Methodist Willowbrook  
Houston Methodist Research Institute  
Houston Methodist Corporate Division  
Houston Methodist Global Health Care Services  
Houston Methodist Institute for Academic Medicine  
Houston Methodist Specialty Physician Group  
Houston Methodist Primary Care Group  
Houston Methodist Coordinated Care Organization

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**I. POLICY STATEMENT**

To create a safe environment, free of infection/transmission of disease and to protect our patients, employees, and the community from Sars-Cov-2 (COVID-19) infection, Houston Methodist is requiring mandatory immunization of all covered Houston Methodist (HM) employees.

**II. PROCEDURES**

- A. The implementation of this policy will be conducted in phases. **HM Phase 1 employees** are defined as all HM management. This policy will be updated accordingly as additional phases are defined and implemented.
- B. COVID-19 vaccine will be available free of charge to all HM employees. The vaccination program will be coordinated through each HM entity's Employee Health department. Employees also have the option of vaccination elsewhere from a third-party provider of their choice.



- C. Proof of vaccination by a third party must include record of vaccine, the date of vaccine administration, lot number (should the lot be recalled), the location where the vaccine was administered, and the name of the vaccine administrator.
- D. In addition to the vaccination requirement, all HM employees are expected to comply with all other safety requirements defined for COVID-19 as indicated by HM management based on CDC and other applicable regulatory agencies that govern public health and/or patient safety.

E. Phase 1 Employees:

1. Subject to the exemptions defined in this policy, all HM Phase 1 employees who have not begun the vaccination process will be required:
  - a) To get any approved one-dose vaccine (e.g., J&J) or provide proof of vaccination by a third-party provider to Employee Health **on or before April 15, 2021**,
  - b) Get the first shot of any approved two-dose vaccine (e.g., Pfizer, Moderna) and schedule an appointment for a second dose, or proof of vaccination and date of second vaccine appointment from a third-party provider **on or before April 15, 2021**, or
  - c) Apply for and submit all required documentation for an exemption based on a medical condition (including pregnancy deferment) or sincerely held religious belief **on or before April 7, 2021**, in accordance with the procedure described in this policy.

*If proof of vaccination is not provided, or if an exemption is not filed by the stated deadline, you will be assumed to have not completed the vaccine requirement on time.*

2. HM Phase 1 employees who received only the first of the two-dose vaccine as of April 1, 2021, and whose second doses are scheduled after April 15, 2021, are required to provide the date of their second dose appointment to Employee Health by April 15, 2021.

If their second dose is scheduled on or before April 15, 2021, they are required to provide proof of vaccination from a third-party provider, or present proof of vaccination by a third-party provider to Employee Health **on or before April 15, 2021**.

If proof is not provided, you will be assumed to have not timely completed the vaccine requirement.



3. For all HM Phase 1 employees receiving a two-dose vaccine including those who received only a first dose when this policy was announced, proof of the second vaccination must be submitted to employee health within **two (2) days** after the second dose has been received.

If exceptional circumstances exist, and an employee is unable to receive the second dose at the appointed time, please contact Employee Health within **two (2) days** of the scheduled appointment.

If proof of vaccination or rescheduling due to exceptional circumstances is not provided by the stated deadlines, you will be assumed to have not completed the vaccine regimen on time.

4. Any HM Phase 1 employee (i) who is not vaccinated with a first or second dose of the two-dose COVID-19 vaccine by **April 15, 2021**, or (ii) does not have an approved exemption as provided in this policy by **April 15, 2021** will be placed on a two-week, unpaid suspension.

If the vaccine regimen (including a second dose) is not completed before the expiration of the suspension period on **April 29, 2021**, HM will immediately initiate the employment termination process as described in this policy.

5. Any HM Phase 1 employee who does not get a second dose at the appointed time will, absent exceptional circumstances, be placed on an immediate two-week, unpaid suspension.

If the second dose is not administered before the expiration of the suspension period, HM will immediately initiate the employment termination process as described in this policy.

F. Exemption Process and Protocols:

1. Exemption from vaccination may be granted for medical contraindications (including pregnancy if properly supported by medical documentation) and sincerely held religious beliefs. Employees are required to submit a ***Request for Medical Exemption from COVID-19 Vaccination or Request for Religious Exemption from COVID-19*** to Employee Health via the Enterprise Portal/MARS Employee Self-Service portal, and any additional required certification that verifies the reason for the requested exemption.
2. Employees will be notified within seven (7) days of submission of their application if it is approved or denied, and, if approved, of any restrictions or requirements they will be required to follow so long as they remain unvaccinated. If additional clarification is needed, employees will be contacted within the same time period and are expected to provide the requested clarification within five (5) days to Employee Health absent exceptional circumstances. No employment action will be taken until the exemption process is complete.

3. Employees who applied for and were denied an exemption for a medical condition or a sincerely held religious belief as part of the HOPE bonus may apply again for an exemption through this process.
4. Approved exemptions will only be valid for the year in which they were requested and/or the period for which the exemption is approved or the reason for the exemption persists. For example, if an exemption request is submitted and approved due to pregnancy, the employee will be required to obtain an extension of the exemption after the employee is no longer pregnant. Currently, exemptions for any or all future years will require completion and submission of a ***Request for Medical/Religious Exemption from COVID-19 Vaccination*** form each year an exemption is requested.
5. Phase 1 Employees:
  - a) ***Request for Medical/Religious Exemption from COVID-19 Vaccine*** must be submitted to Employee Health the employee's entity via email no later than **April 7, 2021**.
  - b) Employee Health will also collect and document the ***Request for Religious Exemption*** from COVID-19 Vaccination. Exemption requests must be submitted by **April 7, 2021** and will be reviewed in accordance with HM HR policies.
  - c) *No employment action will be taken until the exemption process is complete.*

G. Consequences for Employee for Failure to Comply

1. Failure of any employee to receive a COVID-19 vaccination or submit a Request for Exemption form by the deadline of their assigned vaccine implementation phase will result in the employee being placed on unpaid suspension (PTO may not be used during this time) for up to 14 days so that the employee can come into compliance.
2. **HM Phase 1 employees** who come into compliance before the end of the applicable 14-day suspension period will be scheduled to return to work as soon as administratively possible based on department scheduling protocols. All employees who have not received both doses of the vaccine or are denied an exemption as of the completion of the applicable 14-day suspension period will be terminated from employment by HM.
3. Failure to comply with protective measure requirements (such as surgical masks and face shields) for those employees approved for a medical or religious exemption from vaccination during the duration as directed, will result in an unpaid 3-day suspension for the first occurrence of non-compliance. Any and all subsequent failures to comply with protective measures requirements while at work will result in termination.



### **III. MANAGEMENT RESPONSIBILITIES**

- A. Ensure 100% of covered employees are aware of this policy, the mandatory vaccine requirement, the exemption process, and any applicable educational materials regarding the vaccine, as appropriate.
- B. Review weekly reports of each covered employee's status regarding compliance in obtaining COVID-19 vaccination or approved exemption.
- C. Maintain the confidentiality of any medical information or information concerning vaccine status of employees. Such information should be treated as need to know only.
- D. Management should refrain from asking employees follow up questions about their vaccine status that may tend to reveal a disability. If an employee indicates that they qualify for an exemption, the employee should be referred to the exemption process without being required to answer any further questions.
- E. Ensure all employees, vaccinated or not, are aware of any department specific requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self and others.
- F. Ensure all employees with an exemption follow any additional required restrictions, safety protocols, or safety requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self and others.
- G. Ensure all policy and procedural steps are followed as outlined in this policy including communicating and administering the "failure to comply" consequences in a timely and consistent manner.

### **IV. EMPLOYEE RESPONSIBILITIES**

- A. Ensure vaccination compliance by the stated deadline.
- B. For those employees with approved exemptions, comply with all job restrictions, safety protocols, and safety requirements as directed due to non-vaccinated status. Wear appropriate PPE specified for non-vaccinated employees, which may include masks and/or face shields and other PPE for the period of time designated by management and/or infection control.
- C. Follow all COVID related reporting and safety protocols, whether you are vaccinated or not.

### **V. EMPLOYEE HEALTH RESPONSIBILITIES**

- A. Provide COVID-19 vaccinations to all employees during the designated timeframe with appropriate consent.

- B. Maintain all records of COVID-19 immunizations and exemptions, ensuring timely input of compliance in appropriate management information systems.
- C. Review the ***Request for Medical/Religious Exemption from COVID-19 Vaccination document/s*** in a timely manner and coordinate any clarifications as quickly as possible.
- D. Review all submitted documents and complete the ***Request for Religious Exemption from COVID*** process in accordance with HM HR policies.
- E. Work with appropriate departments/resources to provide additional health education consultation regarding benefits of vaccination and appropriate provision of protective equipment for non-vaccinated individuals.
- F. Ensure that personnel outside of Employee Health who have been designated to administer HM COVID-19 vaccines follow the same protocols including completion of appropriate consent forms by each individual they vaccinate. These designated personnel are responsible for providing directly to a member of Employee Health the consent forms either via fax, email, or hand delivery (rather than through inter-office mail).

**VI. HUMAN RESOURCE RESPONSIBILITIES**

Participate in review of ***Request for Religious Exemption from COVID-19 Vaccination*** in a timely manner and coordinate any clarifications as quickly as possible.

**VII. SIGNATURE OF APPROVING EXECUTIVE:** Carole Hackett  
**TITLE:** Senior Vice President, Human Resources, CHRO

SIGNATURE ON FILE

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 Signature of Approving Executive

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 Date Signed

**Revision History**

Revision	Date	Changed by	Revision Summary
0	04/01/2011	Michelle Parker	Original



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**POLICY System\_HR95 MANDATORY COVID-19 VACCINE PROCEDURE - PHASED  
IMPLEMENTATION**

**Effective Date:** 04/14/2021

**Origination Date:** 04/01/2021

**Reference Number:** 24783

**Date Revised/Reviewed:** 04/15/2021

**Version:** 2

**Target Review Date:** 04/14/2024

**Originating Area:**  
Human Resources

**Applies To:**

Houston Methodist Hospital, The Medical Center  
Houston Methodist Baytown  
Houston Methodist Clear Lake  
Houston Methodist Continuing Care Hospital  
Houston Methodist Sugar Land  
Houston Methodist The Woodlands  
Houston Methodist West  
Houston Methodist Willowbrook  
Houston Methodist Research Institute  
Houston Methodist Corporate Division  
Houston Methodist Global Health Care Services  
Houston Methodist Institute for Academic Medicine  
Houston Methodist Specialty Physician Group  
Houston Methodist Primary Care Group  
Houston Methodist Coordinated Care Organization

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**I. POLICY STATEMENT**

To create a safe environment, free of infection/transmission of disease and to protect our patients, employees, and the community from Sars-Cov-2 (COVID-19) infection, Houston Methodist is requiring mandatory immunization of all covered Houston Methodist (HM) employees.

**II. PROCEDURES**

A. The implementation of this policy will be conducted in phases.

**HM Phase 1 employees** are defined as all HM management.

**HM Phase 2 employees** are defined as all HM employees not covered in Phase 1.

In the event this policy is extended beyond HM employees, it will be updated accordingly as additional phases are defined and implemented.



- B. COVID-19 vaccine will be available free of charge to all HM employees. The vaccination program will be coordinated through each HM entity's Employee Health department. Employees also have the option of vaccination elsewhere from a third-party provider of their choice.
- C. Proof of vaccination by a third party must include record of vaccine, the date of vaccine administration, lot number (should the lot be recalled), the location where the vaccine was administered.
- D. In addition to the vaccination requirement, all HM employees are expected to comply with all other safety requirements defined for COVID-19 as indicated by HM management based on CDC and other applicable regulatory agencies that govern public health and/or patient safety.

E. Phase 1 Employees:

1. Subject to the exemptions defined in this policy, all HM Phase 1 employees who have not begun the vaccination process will be required:
  - a) To get any approved one-dose vaccine (e.g., J&J) or provide proof of vaccination by a third-party provider to Employee Health **on or before April 15, 2021**,
  - b) Get the first shot of any approved two-dose vaccine (e.g., Pfizer, Moderna) and schedule an appointment for a second dose, or proof of vaccination and date of second vaccine appointment from a third-party provider **on or before April 15, 2021**, or
  - c) Apply for and submit all required documentation for an exemption based on a medical condition (including pregnancy deferment) or sincerely held religious belief **on or before April 7, 2021**, in accordance with the procedure described in this policy.

*If proof of vaccination is not provided, or if an exemption is not filed by the stated deadline, you will be assumed to have not completed the vaccine requirement on time.*

2. HM Phase 1 employees who received only the first of the two-dose vaccine as of April 1, 2021, and whose second doses are scheduled after April 15, 2021, are required to provide the date of their second dose appointment to Employee Health by April 15, 2021.

If their second dose is scheduled on or before April 15, 2021, they are required to provide proof of vaccination from a third-party provider, or present proof of vaccination by a third-party provider to Employee Health **on or before April 15, 2021**.

If proof is not provided, you will be assumed to have not timely completed the vaccine requirement.



3. For all HM Phase 1 employees receiving a two-dose vaccine including those who received only a first dose when this policy was announced, proof of the second vaccination must be submitted to employee health within **two (2) days** after the second dose has been received.

If exceptional circumstances exist, and an employee is unable to receive the second dose at the appointed time, please contact Employee Health within **two (2) days** of the scheduled appointment.

If proof of vaccination or rescheduling due to exceptional circumstances is not provided by the stated deadlines, you will be assumed to have not completed the vaccine regimen on time.

4. Any HM Phase 1 employee (i) who is not vaccinated with a first or second dose of the two-dose COVID-19 vaccine by **April 15, 2021**, or (ii) does not have an approved exemption as provided in this policy by **April 15, 2021** will be placed on a two-week, unpaid suspension.

If the vaccine regimen (including a second dose) is not completed before the expiration of the suspension period on **April 29, 2021**, HM will immediately initiate the employment termination process as described in this policy.

5. Any HM Phase 1 employee who does not get a second dose at the appointed time will, absent exceptional circumstances, be placed on an immediate two-week, unpaid suspension.

If the second dose is not administered before the expiration of the suspension period, HM will immediately initiate the employment termination process as described in this policy.

F. Phase 2 Employees:

1. Subject to the exemptions defined in this policy, all HM Phase 2 employees who have not begun the vaccination process will be required:
  - a) To get any approved one-dose vaccine (e.g., J&J) or provide proof of vaccination by a third-party provider to Employee Health **on or before June 7, 2021**,
  - b) To receive both doses of any approved two-dose vaccine (e.g., Pfizer, Moderna) through HM, or provide proof of vaccination from a third-party provider **on or before June 7, 2021**. Since scheduling second vaccinations varies on the manufacturer guidelines and availability of appointments with providers, employees are highly encouraged to receive their first vaccination of a 2-dose vaccine no later than May 7, 2021 to ensure compliance with complete vaccination by June 7, 2021.

- c) Apply for and submit all required documentation for an exemption based on a medical condition (including pregnancy deferment) or sincerely held religious belief **on or before May 3, 2021**, in accordance with the procedure described in this policy.

Employees whose exemptions are denied after May 3, 2021 must follow the following protocol:

- (1) Get any approved one-dose vaccine (e.g., J&J) or provide proof of vaccination by a third-party provider to Employee Health on or before June 7, 2021, or
- (2) Schedule the first appointment for a two-dose vaccine to be completed within one week of the exemption denial date. If received through a third-party provider, proof of the first vaccination **and** the date of the second dose appointment must be submitted to Employee Health within **(2) days** of the scheduled appointment or by June 1, whichever comes later.

If the second dose is received from a third-party, proof of completion of the second dose through must be submitted to Employee Health within (2) days of the scheduled appointment or by June 7, whichever comes later.

*If proof of vaccination or scheduled vaccination dates are not provided by the stated deadlines above, you will be assumed to have not completed the vaccine requirement on time.*

2. Any HM Phase 2 employee who does not meet the vaccine program requirements as outlined in section F.1 will be placed on a two-week, unpaid suspension starting June 8, 2021 (or later as applicable for employees identified in section F.1.c above).

If the vaccine program requirements are not completed before the expiration of the suspension period on **June 21, 2021 or as otherwise stated for those receiving vaccinations after exemption denials**, HM will immediately initiate the employment termination process as described in this policy.

G. Exemption Process and Protocols:

1. Exemption from vaccination may be granted for medical contraindications (including pregnancy if properly supported by medical documentation) and sincerely held religious beliefs. Employees are required to submit a **Request for Medical Exemption from COVID-19 Vaccination or Request for Religious Exemption from COVID-19 to Employee Health via the Enterprise Portal/MARS Employee Self-Service portal**, and any additional required certification that verifies the reason for the requested exemption.



2. Employees will be notified within seven (7) days of submission of their application if it is approved or denied, and, if approved, of any restrictions or requirements they will be required to follow so long as they remain unvaccinated. If additional clarification is needed, employees will be contacted within the same time period and are expected to provide the requested clarification within five (5) days to Employee Health absent exceptional circumstances. No employment action will be taken until the exemption process is complete.
3. Employees who applied for and were denied an exemption for a medical condition or a sincerely held religious belief as part of the HOPE bonus may apply again for an exemption through this process.
4. Approved exemptions will only be valid for the year in which they were requested and/or the period for which the exemption is approved or the reason for the exemption persists. For example, if an exemption request is submitted and approved due to pregnancy, the employee will be required to obtain an extension of the exemption after the employee is no longer pregnant. Currently, exemptions for any or all future years will require completion and submission of a ***Request for Medical/Religious Exemption from COVID-19 Vaccination*** form each year an exemption is requested.
5. Phase 1 Employees:
  - a) ***Request for Medical/Religious Exemption from COVID-19 Vaccine*** must be submitted to Employee Health the employee's entity via email no later than **April 7, 2021**.
  - b) Employee Health will also collect and document the ***Request for Religious Exemption*** from COVID-19 Vaccination. Exemption requests must be submitted by **April 7, 2021** and will be reviewed in accordance with HM HR policies.
  - c) *No employment action will be taken until the exemption process is complete.*
6. Phase 2 Employees: See Section F.



H. Consequences for Employee for Failure to Comply

1. Failure of any employee to receive a COVID-19 vaccination or comply with the stated deadlines for completing the Request for Exemption process by the stated deadlines of their assigned vaccine implementation phase will result in the employee being placed on unpaid suspension (PTO may not be used during this time) for up to 14 days so that the employee can come into compliance.
2. **HM Phase 1 and 2 employees** who come into compliance before the end of the applicable 14-day suspension period will be scheduled to return to work as soon as administratively possible based on department scheduling protocols. All employees who have not received both doses of the vaccine or are met the exemption requirements as of the completion of the applicable 14-day suspension period will be terminated from employment by HM.
3. Failure to comply with protective measure requirements (such as surgical masks and face shields) for those employees approved for a medical or religious exemption from vaccination during the duration as directed, will result in an unpaid 3-day suspension for the first occurrence of non-compliance. Any and all subsequent failures to comply with protective measures requirements while at work will result in termination.

III. **MANAGEMENT RESPONSIBILITIES**

- A. Ensure 100% of covered employees are aware of this policy, the mandatory vaccine requirement, the exemption process, and any applicable educational materials regarding the vaccine, as appropriate.
- B. Review weekly reports of each covered employee's status regarding compliance in obtaining COVID-19 vaccination or approved exemption.
- C. Maintain the confidentiality of any medical information or information concerning vaccine status of employees. Such information should be treated as need to know only.
- D. Management should refrain from asking employees follow up questions about their vaccine status that may tend to reveal a disability. If an employee indicates that they qualify for an exemption, the employee should be referred to the exemption process without being required to answer any further questions.
- E. Ensure all employees, vaccinated or not, are aware of any department specific requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self and others.
- F. Ensure all employees with an exemption follow any additional required restrictions, safety protocols, or safety requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self and others.

- G. Ensure all policy and procedural steps are followed as outlined in this policy including communicating and administering the "failure to comply" consequences in a timely and consistent manner.

#### IV. EMPLOYEE RESPONSIBILITIES

- A. Ensure vaccination compliance by the stated deadline for your implementation phase.
- B. For those employees with approved exemptions, comply with all job restrictions, safety protocols, and safety requirements as directed due to non-vaccinated status. Wear appropriate PPE specified for non-vaccinated employees, which may include masks and/or face shields and other PPE for the period of time designated by management and/or infection control.
- C. Follow all COVID related reporting and safety protocols, whether you are vaccinated or not.

#### V. EMPLOYEE HEALTH RESPONSIBILITIES

- A. Provide COVID-19 vaccinations to all employees during the designated timeframe with appropriate consent.
- B. Maintain all records of COVID-19 immunizations and exemptions, ensuring timely input of compliance in appropriate management information systems.
- C. Review the ***Request for Medical/Religious Exemption from COVID-19 Vaccination document/s*** in a timely manner and coordinate any clarifications as quickly as possible.
- D. Review all submitted documents and complete the ***Request for Religious Exemption from COVID*** process in accordance with HM HR policies.
- E. Work with appropriate departments/resources to provide additional health education consultation regarding benefits of vaccination and appropriate provision of protective equipment for non-vaccinated individuals.
- F. Ensure that personnel outside of Employee Health who have been designated to administer HM COVID-19 vaccines follow the same protocols including completion of appropriate consent forms by each individual they vaccinate. These designated personnel are responsible for providing directly to a member of Employee Health the consent forms either via fax, email, or hand delivery (rather than through inter-office mail).

#### VI. HUMAN RESOURCE RESPONSIBILITIES

- A. Participate in review of ***Request for Religious Exemption from COVID-19 Vaccination*** in a timely manner and coordinate any clarifications as quickly as possible.

- B. Monitor employee compliance and ensure suspension and termination for non-compliance are followed in accordance with policy.

**VII. SIGNATURE OF APPROVING EXECUTIVE:** Carole Hackett  
**TITLE:** Senior Vice President, Human Resources, CHRO

SIGNATURE ON FILE

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Signature of Approving Executive

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Date Signed

**Revision History**

Revision	Date	Changed by	Revision Summary
0	04/01/2021	Michelle Parker	Original
1	04/09/2021	Michelle Parker	Added Phase II details for all non-management employees.